

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**DECLARATION OF
EWEN SETTI**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

Defendants.

I, Ewen Setti, declare as follows:

1. I was an employee of Chubb Insurance Company of Europe ("Chubb Europe") from September 2000 to July 2016. During that time, my positions were in the Information Technology Department. From September 2000 to July 2016 I was the Development Manager, Commercial Lines IT.

2. In my role at Chubb Europe, I worked with FICO's Blaze Advisor ("Blaze") software. When Chubb Europe, through the Chubb Specialty Insurance (CSI) business unit, decided to move forward with using Blaze, I was the main developer for this project and communicated directly with FICO. I recall setting up a series of workshops with FICO regarding Blaze. During these workshops, it was understood that Chubb Europe had a global license to install and use Blaze, and FICO did not suggest

otherwise, nor did FICO attempt to charge us additional license fees to install or use Blaze in Europe. Additionally, a member of FICO's management visited our offices in London to help us get up to speed with Blaze.

3. In fact, Chubb Europe was in the same building as FICO, so whenever we needed help with Blaze, we went directly to FICO. I visited FICO's offices in our building for this purpose a couple of times.

4. There was no discussion or negotiation with FICO regarding the scope of the Blaze license or payment for the license because it was understood by Chubb Europe and FICO that the license to install and use Blaze was global.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: August 28, 2019


